

1 MICHAEL A. KELLY, State Bar No. 71460

[MKelly@WalkupLawOffice.com](mailto:MKelly@WalkupLawOffice.com)

2 RICHARD H. SCHOENBERGER, State Bar No. 122190

[RSchoenberger@WalkupLawOffice.com](mailto:RSchoenberger@WalkupLawOffice.com)

3 MATTHEW D. DAVIS, State Bar No. 141986

[MDavis@WalkupLawOffice.com](mailto:MDavis@WalkupLawOffice.com)

4 JADE SMITH-WILLIAMS, State Bar No. 318915

[JSmithWilliams@WalkupLawOffice.com](mailto:JSmithWilliams@WalkupLawOffice.com)

5 WALKUP, MELODIA, KELLY & SCHOENBERGER

650 California Street

San Francisco, CA 94108

Telephone: 415-889-2919

7 Facsimile: 415-391-6965

8 ALAN A. GREENBERG, State Bar No. 150827

[AGreenberg@GGTrialLaw.com](mailto:AGreenberg@GGTrialLaw.com)

9 WAYNE R. GROSS, State Bar No. 138828

[WGross@GGTrialLaw.com](mailto:WGross@GGTrialLaw.com)

10 DEBORAH S. MALLGRAVE, State Bar No. 198603

[DMallgrave@GGTrialLaw.com](mailto:DMallgrave@GGTrialLaw.com)

11 GREENBERG GROSS LLP

601 South Figueroa Street, 30th Floor

Los Angeles, CA 90017

Telephone: 213-334-7000

13 Facsimile: 213-334-7001

14 Attorneys for All Plaintiffs

15 JOHN K. DIPAOLO, State Bar No. 321942

[dipaolojohn@uchastings.edu](mailto:dipaolojohn@uchastings.edu)

16 General Counsel

Secretary to the Board of Directors

17 Hastings College of the Law

200 McAllister Street

18 San Francisco, CA 94102

Telephone: 415-565-4787

19 Facsimile: 415-565-4825

20 Attorney for Plaintiff

HASTINGS COLLEGE OF THE LAW

22 DENNIS J. HERRERA, State Bar No. 139669

City Attorney

23 MEREDITH B. OSBORN, State Bar No. 250467

Chief Trial Deputy

24 JEREMY M. GOLDMAN, State Bar No. 218888

[Jeremy.Goldman@sfcityatty.org](mailto:Jeremy.Goldman@sfcityatty.org)

25 TARA M. STEELEY, State Bar No. 231775

[Tara.Steeley@sfcityatty.org](mailto:Tara.Steeley@sfcityatty.org)

26 RYAN STEVENS, State Bar No. 306409

[Ryan.Stevens@sfcityatty.org](mailto:Ryan.Stevens@sfcityatty.org)

27 Deputy City Attorneys

Fox Plaza

28 1390 Market Street, Sixth Floor

1 San Francisco, CA 94102-5408  
2 Telephone: 415-554-3975  
3 Facsimile: 415-554-3837

4 Attorneys for Defendant  
5 CITY AND COUNTY OF SAN FRANCISCO

6 **UNITED STATES DISTRICT COURT**  
7 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

8 HASTINGS COLLEGE OF THE  
9 LAW, a public trust and institution  
10 of higher education duly organized  
11 under the laws and the Constitution  
12 of the State of California;  
13 FALLON VICTORIA, an individual;  
14 RENE DENIS, an individual;  
15 TENDERLOIN MERCHANTS AND  
16 PROPERTY ASSOCIATION, a  
17 business association;  
18 RANDY HUGHES, an individual; and  
19 KRISTEN VILLALOBOS, an  
individual,

Plaintiffs,

v.

20 CITY AND COUNTY OF SAN  
21 FRANCISCO, a municipal entity,  
22 Defendant.  
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Case No. 4:20-cv-03033-JST

**JOINT CASE MANAGEMENT  
STATEMENT**

1 As directed by the Order of this Court, the parties met and conferred and  
2 submit this joint Case Management Conference Statement.

3 1. Both sides are interested in exploring informal resolution of the  
4 case on an expedited basis.

5 2. Plaintiffs would prefer that this Court be included in all aspects of  
6 the case, including settlement discussions. To that end, plaintiffs would consent  
7 to this Court having ex parte communications with defendant City and County  
8 of San Francisco (City), including the City Attorney's Office, the Office of the  
9 Mayor, and any City official, agency or department. Plaintiffs would not  
10 condition their consent to this Court making ex parte settlement  
11 communications with the City on the Court also being able to have ex parte  
12 settlement communications with the plaintiffs -- although plaintiffs would prefer  
13 that the Court also be able to do so.

14 3. Because this Court would have to adjudicate contested issues  
15 should the parties be unable to reach a settlement, the City believes that it is  
16 preferable for a Magistrate Judge to assist the parties in settlement discussions.  
17 While a negotiated resolution is likely to require more than one settlement  
18 conference (given the number of City agencies from which input would be  
19 necessary), the City proposes that plaintiffs and a limited number of City  
20 representatives hold a preliminary meeting with the Magistrate at the earliest  
21 opportunity. The City believes that Magistrate Judge Corley would be well  
22 suited to assist the parties in this matter and requests assignment to her if she is  
23 available.

24 4. Plaintiffs are preparing pleadings requesting a preliminary  
25 injunction and order of mandamus. The City proposes a pause on motions and  
26 responsive pleadings so that the parties' energies can be focused on settlement  
27 discussions. Plaintiffs would agree to an initial 20-day extension of time for the  
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1 City to respond to the complaint and to hold off on filing motions for a  
2 preliminary injunction and order of mandamus for that time period.

3 5. The parties agree that frequent and focused case management  
4 conferences would be helpful at the outset of the litigation.

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6 WALKUP, MELODIA, KELLY & SCHOENBERGER  
7 GREENBERG GROSS LLP  
8

9 Dated: May 13, 2020

By: /S/ Matthew D. Davis  
Michael A. Kelly  
Richard H. Schoenberger  
Matthew D. Davis  
Jade Smith-Williams  
John K. DiPaolo  
Alan A. Greenberg  
Wayne R. Gross  
Deborah S. Mallgrave  
Attorneys for Plaintiffs HASTINGS  
COLLEGE OF THE LAW; FALLON  
VICTORIA; RENE DENIS; TENDERLOIN  
MERCHANTS AND BUSINESS OWNERS  
ASSOCIATION; RANDY HUGHES; and  
KRISTEN VILLALOBOS

17  
18  
19  
20 OFFICE OF THE CITY ATTORNEY  
21

22 Dated: May 13, 2020

By: /S/ Ryan Stevens  
Dennis J. Herrera  
Meredith B. Osborn  
Jeremy M. Goldman  
Tara M. Steele  
Ryan Stevens  
Attorneys for Defendant CITY AND  
COUNTY OF SAN FRANCISCO  
26  
27  
28